IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| DISH NETWORK, L.L.C., | Civil Action No. 4.17 ev. 01619 |
|-------------------------------------|----------------------------------|
| Plaintiff, |) Civil Action No. 4:17-cv-01618 |
| V. |) |
| SHAHJAHAN DURRANI, d/b/a/ Zem TV, |) |
| and ADAM LACKMAN, d/b/a |) |
| www.tvaddons.org, www.tvaddons.org, | |
| www.streamingboxes.com, and | |
| www.offshoregit.com, |) |
| | |
| Defendants. | |

ATTORNEY ERIN K. RUSSELL'S MOTION TO WITHDRAW AS COUNSEL FOR SHAHJAHAN DURRANI

COMES NOW Attorney Erin K. Russell, counsel for Defendant Shahjahan Durrani, and brings this Motion to Withdraw as Counsel pursuant to L.R. 83.2, and requests that the Court grant this motion and permit her to withdraw as counsel for Defendant Durrani, showing the Court as follows:

This is a copyright infringement matter brought by DISH Network, a Colorado limited liability company, against Lackman, a Canadian citizen, and Durrani, a British citizen of the United Kingdom. DISH contends that Durrani developed the ZemTV add-on and managed and operated the ZemTV service. DISH contends that Durrani, along with co-defendant Lackman, marketed, made available, and distributed the ZemTV service to internet users in violation of the Copyright Act. DISH admits that the works at issue were not registered with the U.S. Copyright Office.

On November 27, 2017, Mr. Durrani hired Ms. Russell to represent him in this matter. On January 5, 2018, Durrani filed his Motion to Dismiss based on jurisdiction. [ECF No. 24]. That motion was denied on April 19, 2018. [ECF No. 29].

On May 7, 2018, Mr. Durrani instructed the undersigned to cease all activity on this matter and

to take no further steps on his behalf, citing his inability to pay for counsel. He confirmed that instruction via email on that date. A copy of that email is attached hereto as Exhibit A.

WHEREFORE, the undersigned respectfully requests that the Court grant this motion and enter an order permitting her to withdraw as counsel for Mr. Durrani in this matter.

Respectfully submitted,

THE RUSSELL FIRM, LLC 1519 W. Haddon Avenue, Suite D Chicago, Illinois 60642 Telephone: (312) 994-2424 Facsimile: (312) 706-9766

/s/ Erin K. Russell
Erin K. Russell
Illinois ARDC Number 6287255
Admitted Pro Hac Vice
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ATTORNEY FOR DEFENDANT SHAHJAHAN DURRANI

CERTIFICATE OF SERVICE

This is to certify that on May 18, 2018, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record. A copy has also been served upon Shahjahan Durrani via email at shahjahandurrani@hotmail.com.

/s/ Erin K. Russell